

LEBEDIN | KOFMAN
LLP
ATTORNEYS AT LAW
26 BROADWAY, 27TH FLOOR
NEW YORK, NY 10004
T (212)500-3273
F (855)696-6848

ARTHUR LEBEDIN*
RUSS KOFMAN+
CONOR MCNAMARA+
LARITA YUSEF#
COURTNEY CHADWELL+

* Member N.Y. & N.J. Bar
+ Member N.Y. Bar
Member N.Y., N.J., N.C. & S.C. Bar

March 27, 2020

SENT VIA ECF & EMAIL ONLY

The Honorable Judge Gregory H. Woods

**Re: USA v. Kromah 19-CR-00338
Request for additional time in filing pretrial motions.**

Your Honorable Judge Woods,

Our office represents Mr. Moazu Kromah in the above captioned matter. On March 6th, 2020, the Court granted an application for additional time to file defense motions as undersigned counsel and AUSA Schaeffer were in plea negotiations. On March 11th, 2020 AUSA Schaeffer provided our office with a plea agreement to discuss with Mr. Kromah.

Due to the current Covid19 crisis, MCC, where Mr. Kromah is being housed has been locked down to attorney and family visits. Counsel has been unable to review the plea agreement with Mr. Kromah who also needs a Madingo interpreter.

Given the current circumstances we are respectfully requesting an extension to file defense motions for 45 days to May 21st, 2020. Undersigned has spoken with AUSA Jarrod Schaeffer who consents to the extension to file motions. This extension will allow us to review the plea agreement in its entirety with our client through an interpreter. Our office also agrees to an exclusion of trial under 18 U.S.C. 3161(h)(7)(A) Speedy trial act and have attached an order for the Court.

Should the Court require any further information please contact me at your convenience on 212-500-3273

/s/ Conor McNamara
Conor McNamara, Esq.
Attorney for Moazu Kromah

Cc: AUSA Jarrod Schaeffer (via ECF)